

**BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF PITNEY BOWES INC. TO UNITED STATES
POSTAL SERVICE WITNESS DREW MITCHUM
(PB/USPS-T40-1-2)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness Drew Mitchum. If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

/s/
James Pierce Myers
Attorney at Law
1211 Connecticut Avenue, NW
Suite 610
Washington, DC 20036
Telephone: (202) 331-8315
Facsimile: (202) 331-8318
E-Mail: jpm@piercemyers.com

Michael F. Scanlon
PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
1735 New York Avenue, NW
Washington, DC 20006
Telephone: (202) 628-1700
Facsimile: (202) 331-1024
E-Mail: mscanlon@prestongates.com

Counsel to PITNEY BOWES INC.

DATED: June 22, 2006

PB/USPS-T40-1. Please refer to page 18 of your testimony where you discuss your proposed new fee structure and fees for Confirm Service:

- a. Please confirm whether, under the proposed rate schedule for Confirm, a subscriber may purchase blocks of 1 million units one at a time. If you cannot confirm, please explain fully and state how many blocks must be purchased at any given time.
- b. Please confirm whether the declining rate schedule applies to each ID purchased by a subscriber that purchases more than one ID. If you cannot confirm, please explain fully.

PB/USPS-T40-2. Please refer to your response to OCA/USPS-T40-15 (a-d), where you state “the estimated total number of blocks to be purchased in the test year [is] (28,152)”

- a. Please provide a detailed explanation of how you developed this estimate for the total number of blocks to be purchased in the test year.
- b. Please confirm that 28,152 blocks represents 28,152,000,000 scans in TY 2008. If you cannot confirm, please explain fully.
- c. Please provide an estimate of how many of these scans will be for First-Class Mail pieces in TY 2008.
- d. Please provide an estimate of how many of these scans will be for Standard Mail pieces in TY 2008.
- e. Please provide an estimate of how many scans per piece do you assume for First-Class Mail in TY 2008.

- f. Please provide an estimate of how many scans per piece do you assume for Standard Mail in TY 2008.
- g. Please describe fully the basis for the estimates in PB/USPS-T40-2 (c-f).
- h. Please provide the total number of scans for Confirm in the Base Year.
- i. Please provide the distribution of the total number of scans for Confirm in the Base Year across First-Class Mail and Standard Mail.
- j. Please provide the total number of pieces of First-Class Mail that were scanned for Confirm in the Base Year.
- k. Please provide the total number of pieces of Standard Mail that were scanned for Confirm in the Base Year.